

WWR# 21372034

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:
DEIRDRE THURSTON-FRAZIER
MICHAEL FRAZIER

Debtors

LSF9 MASTER PARTICIPATION TRUST
Movant

Case No. 16-14853

Chapter 13

Hearing Date: 09/13/2017

Hearing Time: 10:00 am

REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to F.R.C.P. 34, Movant hereby requests that the Debtors produce for inspection by the undersigned attorney for the Movant the following:

1. If you deny any or all of the subsections under Movant's Request for admission No. 1:
 - (a) Canceled check, receipt, proof of money order, or other documentation evidencing that the post-petition payments due for 04/01/2017, were tendered to Movant.
 - (b) Canceled check, receipt, proof of money order, or other documentation evidencing that the post-petition payments due for 05/01/2017, were tendered to Movant.
 - (c) Canceled check, receipt, proof of money order, or other documentation evidencing that the post-petition payments due for 06/01/2017, were tendered to Movant.
 - (d) Canceled check, receipt, proof of money order, or other documentation evidencing that the post-petition payments due for 07/01/2017, were tendered to Movant.
2. Copies of any and all documents, federal and state court opinions (whether published or unpublished), federal guidelines or other applicable statutory or common law bases upon which you rely in denying Plaintiff's Request for Admission Number 1.

Respectfully Submitted,

WELTMAN, WEINBERG & REIS CO., L.P.A.

BY: /s/ Keri P. Ebeck
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